

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

U.S. COMMODITY FUTURES TRADING
COMMISSION, *et al.*

Plaintiffs,

V.

TMTE, INC. a/Ida METALS.COM, CHASE
METALS, INC., CHASE METALS, LLC,
BARRICK CAPITAL, INC., LUCAS THOMAS
ERB a/Ida LUCAS ASHER a/Ida LUKE ASHER,
and SIMON BATASHVILI,

Defendants,

TOWER EQUITY, LLC,

Relief Defendant.

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CIVIL ACTION NO.  
3:20-CV-2910-L

**APPENDIX IN SUPPORT OF RECEIVER'S**  
**MOTION TO IDENTIFY CERTAIN ENTITIES IN RECEIVERSHIP**

The Receiver submits the following Appendix in Support of the Receiver's Motion to Identify Certain Entities in Receivership, as follows:

**Exhibit A      Declaration of Receiver Kelly Crawford,      pages 4 to 9**

**Exhibits attached to Declaration:**

Exhibit 1 Email from counsel for Defendants pages 10 to 12Exhibit 2 Email from Graham Norris pages 13 to 14

Exhibit 3 Transcript of Asher Deposition and

|                                                    |                |
|----------------------------------------------------|----------------|
| Batashvili Deposition                              | pages 15 to 46 |
| Exhibit 4 Corporate record for Resource Financial  | page 47        |
| Exhibit 5 Corporate record for Egon Pearson        | page 48        |
| Exhibit 6 Corporate record for Retirement Insider  | page 49        |
| Exhibit 7 Corporate record for Best New, Inc.      | page 50        |
| Exhibit 8 Corporate record for Tower Estates, Inc. | page 51        |
| Exhibit 9 Corporate record for USA Accounts, Inc.  | page 52        |

Dated: February 25, 2021

Respectfully submitted,  
**SCHEEF & STONE, L.L.P.**

By: /s/ Peter Lewis  
Peter Lewis  
Texas State Bar No.12302100  
Peter.lewis@solidcounsel.com

500 N. Akard Street, Suite 2700  
Dallas, Texas 75201  
(214) 706-4200 – Telephone  
(214) 706-4242 – Telecopier

**ATTORNEY FOR RECEIVER**  
**KELLY M. CRAWFORD**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on February 25, 2020, I electronically filed the foregoing document with the clerk of the U.S. District Court, Eastern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record.

/s/ Peter Lewis  
**PETER LEWIS**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

U.S. COMMODITY FUTURES TRADING  
COMMISSION, *et al.*

**Plaintiffs,**

V.

TMTE, INC. a/Ida METALS.COM, CHASE  
METALS, INC., CHASE METALS, LLC,  
BARRICK CAPITAL, INC., LUCAS THOMAS  
ERB a/Ida LUCAS ASHER a/Ida LUKE ASHER,  
and SIMON BATASHVILI,

**Defendants,**

TOWER EQUITY, LLC,

**Relief Defendant.**

www.pearsoned.com

CIVIL ACTION NO.  
3:20-CV-2910-L

**DECLARATION OF RECEIVER KELLY M. CRAWFORD**

My name is Kelly M. Crawford, I am over 18 years of age, have never been convicted of any crime involving moral turpitude and I am fully competent to make this Declaration.

1. I am the Receiver appointed by this Court by an *Order Granting Plaintiffs' Emergency Ex Parte Motion for Statutory Restraining Order, Appointment of Receiver, and Other Equitable Relief (the "SRO")* entered on September 22, 2020 in the case styled above and I have personal knowledge of each of the facts stated below.

2. Pursuant to my duties as Receiver I have been investigating the assets owned or controlled by the Defendants and Relief Defendants to determine, among other things, if there are any affiliates or subsidiaries that they own or control that are subject to the SRO and the

Individuals' Consent Order and Entities' Consent Order (collectively, the "Receivership Orders").<sup>1</sup>

This investigation includes taking two depositions of Defendant Lucas Asher, deposing Defendant Simon Batashvili, seizing documents, including corporate books and records, in the primary office of the Defendants located at 8383 Wilshire Blvd., Beverly Hills, California, having the mail addressed to the Defendants redirected to me, and obtaining information from third parties, including financial institutions.

3. As Receiver I made demand upon the attorney for Defendants Asher and Batashvili to identify entities they owned or controlled. Due to their failure to respond to my requests, on October 23, 2020 I filed an *Emergency Motion for "Show Cause" Hearing to Hold Defendants Asher and Batashvili in Civil Contempt* [Docket No. 175]. Soon after the Motion was filed, the attorney for Defendants Asher and Batashvili sent me an email identifying the entities the Defendants admit to owning or controlling. A true and correct copy of the email from counsel for Defendants Asher and Batashvili dated October 25, 2020 is attached hereto as Exhibit 1 and incorporated herein by reference. Based on this email, Defendants Asher and Batashvili admitted to owning and controlling the following entities:

Best New, Inc.

Chasing Metals, Inc.

Delaware Wholesale, Inc.

Faulkner Music, LLC

First American Estate and Trust, LLC

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<sup>1</sup> The *Consent Order of Preliminary Injunction and Other Equitable Relief Against Defendants Lucas Thomas Erb a/k/a Lucas Asher a/k/a Luke Asher and Simon Batashvili (the "Individuals' Consent Order")* [Docket No. 165], and the *Consent Order of Preliminary Injunction and Other Equitable Relief Against Defendants TMTE, Inc. a/k/a Metals.com, Chase Metals, Inc., Chase Metals, LLC, Barrick Capital, Inc., and Relief Defendant Tower Equity, LLC (the "Entities' Consent Order")* [Docket No. 164].

Merrill Gold, LLC

Prometheus Laboratories Int. Cor. (IBC)

Prometheus Laboratories Int. Corp. (PIF)

Street Invasion, Inc.

Tower Estates, Inc.

Tower Estates Holdings, Inc.

Tower Holdings, Inc.

Tower Property One, LLC

Tower Property Two, LLC

4. In addition, the Receiver contacted Graham Norris, Esq., an attorney used by the Defendants to establish entities owned or controlled by Defendants Asher and/or Batashvili. Mr. Graham identified for the Receiver entities owned or controlled by the Defendants. Attached hereto as Exhibit 2 is a true and correct copy of the email from Graham Norris, Esq. to the Receiver. Defendant Asher also corroborated his ownership of the entities in his depositions<sup>2</sup>:

Access Unlimited<sup>3</sup>

Aqua Billboards<sup>4</sup>

Eagon Pearson<sup>5</sup>

Reagan Financial, Inc.<sup>6</sup>

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<sup>2</sup> True and correct excerpts from the depositions of Defendant Asher and Defendant Batashvili are attached hereto as Exhibit 3 and incorporated herein by reference. ("Asher Depo.).

<sup>3</sup> Asher Depo. at p. 406, lines 20-25.

<sup>4</sup> Asher Depo. at p. 409, lines 7-13.

<sup>5</sup> Asher Depo. at p. 165, lines 10-17.

<sup>6</sup> Asher Depo. at p. 408, lines 23-25 and p. 409, lines 1-3.

Retirement Insider, LLC<sup>7</sup>

Stuggart Industrial, Inc.<sup>8</sup>

TX Admin, Inc.<sup>9</sup>

USA Marketing, Inc.<sup>10</sup>

5. During the course of their depositions, Defendants Asher and Batashvili also admitted that they owned or controlled the following entities:

Administrative Account Services, LLC<sup>11</sup>

Amerivise, LLC<sup>12</sup>

Chasing Gold<sup>13</sup>

Faulkner Management Corp.<sup>14</sup>

Federal Services, LLC<sup>15</sup>

First American Savings, Inc.<sup>16</sup>

Instrubution, LLC and its successor Revo, LLC<sup>17</sup>

Resource Financial<sup>18</sup>

6. During the course of my investigation I discovered a bank statement from Bank of America addressed to Lucas Asher for an account in the name of USA Accounts, Inc. As part of a contempt action against Defendant Asher for transferring monies out the USA Accounts, Inc. account, Defendant Asher

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<sup>7</sup> Asher Depo. at p. 159, lines 1-25.

<sup>8</sup> Asher Depo. at p. 161, lines 7-15.

<sup>9</sup> Asher Depo. at p. 168, lines 9-16; p. 409, lines 14-17.

<sup>10</sup> Asher Depo at p. 160, lines 3-25.

<sup>11</sup> Asher Depo at p. 170, lines 17-22, p. 407, lines 1-3.

<sup>12</sup> Asher Depo. at p. 169, lines 11-25; p. 170, lines 1-12; p. 407, lines 4-7.

<sup>13</sup> Asher Depo. at p. 407, lines 14-16.

<sup>14</sup> Asher Depo. at p. 408, lines 1-4.

<sup>15</sup> Asher Depo. at p. 177, lines 5-20.

<sup>16</sup> Batashvili Depo. at p. 139, lines 17-23.

<sup>17</sup> Asher Depo. at p. 178, lines 24-25; p. 179, lines 1-25; p. 180, lines 1-11; Batashvili Depo. at p. 93, lines 20-25; p. 94, lines 1-2; p. 136, lines 14-25; p. 137, lines 1-5.

<sup>18</sup> Asher Depo. at p. 185, lines 14-25.

admitted that he was the incorporator, operated and controlled USA Accounts, Inc.<sup>19</sup> In addition, the Court found that the monies in the USA Accounts, Inc. bank account were “Receivership Assets”.<sup>20</sup>

7. Pursuant to my duties as Receiver, on September 24, 2020 I took possession of the office of the Defendants at 8383 Wilshire Blvd., Beverly Hills, California. In taking possession of the office, I discovered corporate books and records for the following entities that reflect at least one of the Defendants as owning or controlling the entity:

- a. Resource Financial Services, Inc.<sup>21</sup>
- b. Egon Pearson, LLC<sup>22</sup>
- c. Retirement Insider, LLC<sup>23</sup>
- d. Best New, Inc.<sup>24</sup>
- e. Tower Estates, Inc.<sup>25</sup>
- f. USA Accounts, Inc.<sup>26</sup>

8. Based upon my investigation and the information obtained as set forth above, I believe each of the entities named herein (collectively, the “Affiliated Entities”) were owned or controlled by one or more of the Defendants and Relief Defendant on September 22, 2020 when the SRO was entered and are included within the definition of “Receivership Defendants” set forth

<sup>19</sup> See Agreed Order Finding Defendant Lucas Asher in Contempt of this Court's Orders and Continuance of Show Cause Hearing entered on December 15, 2020 [Docket No. 216].

<sup>20</sup> *Id.*

<sup>21</sup> Attached hereto as Exhibit 4 is a true and correct copy of the *Consent to Action Without a Meeting of the Board of Directors of Resource Financial Services, Inc.*, a corporation appointing Lucas Asher as the sole director.

<sup>22</sup> Attached hereto as Exhibit 5 is a true and correct copy of the *Consent to Action Without a Meeting of the Members of Egon Pearson, LLC* appointing Lucas Asher as manager.

<sup>23</sup> Attached hereto as Exhibit 6 is a true and correct copy of the *Consent to Action Without a Meeting of the Members of Retirement Insider, LLC* appointing Lucas Asher as manager.

<sup>24</sup> Attached hereto as Exhibit 7 is a true and correct copy of the *Consent to Action Without a Meeting of the Directors of Best New, Inc.* appointing Lucas Asher as the director.

<sup>25</sup> The books and records for Tower Estates, Inc. were found at the home of Defendant Simon Batashvili. Attached hereto as Exhibit 8 is a true and correct copy of the *Consent to Action Without a Meeting of the Directors of Tower Estates, Inc.* appointing Simon Batashvili as the director.

<sup>26</sup> Attached hereto as Exhibit 9 is a true and correct copy of a Certificate of Incorporation for USA Accounts, Inc. showing Lucas Asher as the incorporator.



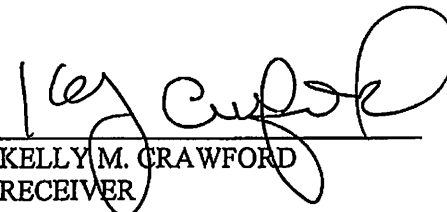
in the Receivership Orders. Without the Affiliated Entities being specifically named in the Receivership Orders it is confusing to third parties as to whether the Affiliated Entities are subject to the Receivership Orders. Accordingly, as Receiver I believe it is in the best interest of the receivership and will significantly assist me in performing my duties, to have the Affiliated Entities specifically identified as being subject to the Receivership Orders.

9. I am not seeking to expand the scope of the relief provided by the Court in the Receivership Orders.

10. Each of the exhibits attached hereto are duplicates of the records in my possession and custody as Receiver. The records were made at or near the time of the occurrence of the matters set forth in the records. The records were maintained by me in the course of my regularly conducted activity as Receiver, and the records were made by the regularly conducted activity as a regular practice.

11. I declare under penalty of perjury that the foregoing is true and correct and is within my personal knowledge.

Dated: February 25, 2021

  
KELLY M. CRAWFORD  
RECEIVER

**Kelly Crawford**

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**From:** Arnold Spencer <arnoldspencer75225@gmail.com>  
**Sent:** Sunday, October 25, 2020 1:00 PM  
**To:** Kelly Crawford  
**Cc:** Peter Lewis  
**Subject:** Batashvili and Asher / Entities  
**Attachments:** Asher Batashvili Entities.pdf; PastedGraphic-2.tiff

Kelly and Peter-

I am attaching a list of entities which Lucas Asher and Simon Batashvili believe they own or control, obviously subject to the Court's Order. The lists are almost certainly incomplete, as both individuals do not have access to their files or other resources to assist them with a comprehensive search. Both individuals are available to answer questions about these or other entities which you may have identified.

Arnold A. Spencer  
Managing Partner  
[www.aspencerlaw.com](http://www.aspencerlaw.com)  
214-385-8500



Dated: October 26, 2020

**Corporate Entities Owned or Controlled by Lucas Asher**

The following is a list of entities that Lucas Asher believes are in his ownership or control. The list was compiled from memory, and without the benefit of any documentation or outside assistance. As a general practice, Mr. Asher relied on lawyers and other professionals to create corporate entities and manage the corporate governance issues, so he does not have personal knowledge of all the entities that may be listed in his name. Some of the entities are technically owned by other entities, but the relevant legal documents are not available for immediate review. For all these reasons, the list may be inaccurate or incomplete.

Best New, Inc.  
Tower Holdings, Inc.  
TMTE, Inc.  
Tower Equity LLC (partial)  
Street Invasion, Inc  
Faulkner Music LLC  
Prometheus Laboratories Int Corp (IBC)  
Prometheus Laboratories Int Corp (PIF)

Graham Norris, Norris Law Group referenced the following entities which Mr. Asher recognizes, but does not know his role, e.e., whether he has legal possession of control of any of these entities or their assets.

*Chase Metals, Inc.*  
*Chase Metals, LLC*  
*Access Unlimited, LLC*  
*Retirement Insider, LLC*  
*USA Marketing , Inc.*  
*Stuttgart Industrial, Inc.*  
*Aqua Billboards, Inc.*  
*Reagan Financial, Inc.*  
*Egon Pearson, LLC*  
*TX Admin, Inc.*

Dated: October 26, 2020

**Corporate Entities Owned or Controlled by Simon Batashvili**

The following is a list of entities that Simon Batashvili believes are in his ownership or control. The list was compiled from memory, and without the benefit of any documentation or outside assistance. As a general practice, Mr. Batashvili relied on lawyers and other professionals to create corporate entities and manage the corporate governance issues, so he does not have personal knowledge of all the entities that may be listed in his name. Some of the entities are technically owned by other entities, but the relevant legal documents are not available for immediate review. Accordingly, this list may be inaccurate or incomplete.

Tower Equity LLC  
Barrick Capital Inc.  
First American Estate and Trust, LLC  
Tower Estates Inc  
Tower Property One, LLC  
Delaware Wholesale Inc.  
chasing metals inc.  
Merrill Gold, LLC  
Tower Property 2, LLC  
Tower Estates Holdings, Inc.

Graham Norris, Norris Law Group referenced a number of entities which Mr. Batashvili does not recall or recognize.

**Kelly Crawford**

---

**From:** graham@norrislawyer.com  
**Sent:** Monday, October 05, 2020 4:58 PM  
**To:** Peter Lewis  
**Cc:** Kelly Crawford  
**Subject:** CFTC, et al. v. TMTE, Inc., et al.; Case No. 3:20-cv-02910-L; Entity List

Peter:

It was a pleasure speaking with you today. As we discussed, pursuant to the terms of the Order, I am providing a list of entities that I know about and can provide information on. I'm happy to explain the services I've provided if need be. In most cases, I resign and appoint my client as the new director/manager, with instructions to hold the initial meetings and to document ownership. As a result, what I have is entities with a client contact, but that doesn't necessarily equate to ownership. (TMTE, Inc. is a special case, as I have been requested to assist in documenting ownership for that entity). With that said, here is what I can provide information on:

**Lucas Asher Entities**

TMTE, Inc. / Chase Metals, Inc. / Chase Metals, LLC / Access Unlimited, LLC  
Tower Holdings, Inc.  
Retirement Insider, LLC  
Best New, Inc.  
USA Marketing, Inc.  
Stuttgart Industrial, Inc. / Aqua Billboards, Inc.

**Simon Batashvili Entities**

Tower Estates Holdings, Inc.  
Tower Property One, LLC  
Tower Property Two, LLC  
Tower Estates, Inc.  
Newmont, Inc.

**Asher + Batashvili Entities**

Tower Equity, LLC  
Select Financial, Inc.  
Reagan Financial, Inc.  
Egon Pearson, LLC  
TX Admin, Inc.

I will start sending you what I have as quickly as possible, starting tomorrow.

Graham H. Norris, Jr.



***Norris Law Group, P.C.***

1156 South State Street, Suite 204  
Orem, UT 84097

1712 Pioneer Avenue  
Cheyenne, WY 82001



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Lucas Asher Vol. I

11/5/2020

Page 1

1 IN THE UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF TEXAS

3

4 )

COMMODITY FUTURES TRADING )

5 COMMISSION et al, )

6 )

Plaintiffs, )

7 )

vs. )

8 )

TMTE, INC. A/k/a METALS.COM, )

CHASE METALS, INC., CHASE )

9 METALS, LLC, BARRICK )

CAPITAL, INC., LUCAS THOMAS )

10 ERB a/k/a LUCAS ASHER a/k/a )

LUKE ASHER, and SIMON )

11 BATASHVILI )

12 )

Defendants. )

13 )

and )

14 )

TOWER EQUITY, LLC, )

15 )

Relief Defendant )

16 )

17 REMOTE VIDEO-RECORDED DEPOSITION OF LUCAS ASHER

18 Thursday, November 5, 2020

19 VOLUME I

20

21 Stenographically Reported by:

Mechelle S. Gonzalez

22 CSR No. 13250

Job No. 96642

23

24

25 PAGES 1 - 291

EXHIBIT

3

Lucas Erb

January 29, 2021

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1 IN THE UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF TEXAS

3 DALLAS DIVISION

4 COMMODITY FUTURES TRADING )

5 COMMISSION, et al., ) Case No.

6 Plaintiffs, ) 3-20CV2910-L

7 vs. )

8 TMTE, INC., et al, )

9 Defendants. )

10 TOWER EQUITY, LLC, )

11 Relief Defendant. )

12 \_\_\_\_\_ )

13  
14  
15 CONTINUED VIDEO DEPOSITION OF LUCAS THOMAS ERB a/k/a

16 LUCAS ASHER, a/k/a LUKE ASHER

17 January 29, 2021

18 VOLUME II, (Pages 293-473)

19  
20  
21 REPORTED REMOTELY BY:

22  
23 COLLEEN P. DOHERTY, CSR 345

24  
25 Notary Public

www.CapitalReportingCompany.com  
202-857-3376

APP 016



FN 3

Lucas Erb

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[REDACTED]

20 Q. Okay. Let me go through some entities before  
21 I pass it over to JonMarc just to see if you recall  
22 whether you've ever had an ownership interest in any of  
23 these entities. Access Unlimited, LLC?

24 A. I believe I have had an ownership interest in  
25 that.

**Lucas Erb**

**January 29, 2021**

FN 4

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[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

|   |                     |
|---|---------------------|
| 7 | Q. Aqua Billboards? |
|---|---------------------|

8           A. Yeah, I believe that corporation was a lot  
9           like the USA Marketing. It was just purchased. It just  
10          sat there, and to my knowledge, it didn't have a bank  
11          account or anything.

12 Q. But that was in your name?

13 | A. I believe half of it was.

[illegible]

Lucas Asher Vol. I

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FN 5

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 Q. Next one is Egon Pearson LLC. Are you

11 familiar with that entity?

12 A. I am familiar with that entity.

13 Q. Do you have an ownership interest in it?

14 A. I have reason to believe I do.

15 Q. Okay. And what did that entity do?

16 A. I believe that was a staffing agency that

17 we were attempting to start up.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

FN 6

Lucas Brb

January 29, 2021

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[REDACTED]

23 Q. Reagan Financial, Inc.?

24 A. I am familiar with that name. I think that  
25 was set up through our attorney at the time, Graham

**Lucas Erb**

**January 29, 2021**

**FN 6**

Page 409

1       Norris.  It's possible that I could have an interest in  
2       that.  I'm not sure.  I would be happy to follow up with  
3       you on that.

[illegible]

Lucas Asher Vol. I

11/5/2020

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FN 7

1 Q. Were you ever an owner of Retirement  
2 Insider LLC?

3 A. I believe I may have been a beneficial  
4 owner of half of it.

5 Q. What did Retirement Insider LLC do?

6 A. It was a -- it was a startup that never got  
7 off the ground, and the intention was for it to be a  
8 news and media company.

9 Q. Did it ever have any employees?

10 A. I believe it did.

11 Q. How many employees?

12 A. I don't recall.

13 Q. Did it office out of the seventh floor of  
14 8383 Wilshire Boulevard?

15 A. It could have been in a different suite on  
16 the seventh floor, yes.

17 Q. Okay. What assets did Retirement Group LLC  
18 have on the day prior to receivership?

19 A. I'm not aware of assets. It was a startup,  
20 so to the best of my knowledge, I'm not aware of  
21 assets it owns.

22 Q. And how was the startup funded? How was  
23 Retirement Insider LLC funded?

24 A. To my knowledge, it was funded by the sale  
25 partially of a newsletter, and then potentially

Lucas Asher Vol. I  
FN 8

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 Q. The next one on your list is Stuttgart  
8 Industrial, Inc.

9 Have you ever had any ownership interest in  
10 that entity?

11 A. Yes, I believe I do have an ownership  
12 interest in that.

13 Q. And what interest is that?

14 A. I -- I believe I am the beneficial owner of  
15 half of it.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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11/5/2020

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FN 9

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

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\_\_\_\_\_

\_\_\_\_\_

9 Q. The next entity is Texas -- or TX Admin,  
10 Inc. Did you have an ownership interest in that  
11 entity?

12           A. I believe I do have a beneficial ownership  
13       interest in it.

14 Q. And what is the purpose of that entity?

15           A. The purpose of that entity was to compete  
16   with JM Bullion.

\_\_\_\_\_

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\_\_\_\_\_



**Lucas Erb**

**January 29, 2021**

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[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

14 Q. Okay. Texas Admin, Inc.?

15 A. Uh-huh. Yeah, I'm familiar with that

16 corporation, and it's possible that half of it was in my

17 name.

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

Lucas Asher Vol. I  
FN 10

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Page 160

■ [REDACTED]

■ [REDACTED]

3 Q. All right. Next one on your list is U.S.A.  
4 Marketing, Inc.

5 Have you ever had an ownership interest in  
6 that entity?

7 A. It's possible.

8 Q. What -- what did U.S.A. Marketing, Inc.,  
9 do?

10 A. I don't know that it did anything.

11 Q. Did it ever have any employees?

12 A. I don't recall much about this entity.

13 Q. Did it ever change its name?

14 A. I don't believe this one did.

15 Q. Did it ever own any domain names?

16 A. I don't recall much about this entity.

17 Q. What do you recall about the entity?

18 A. I recall that we were purchasing or  
19 establishing corporations from Mr. Norris based in  
20 Wyoming with the intention not to use them but to  
21 just hold them because we noticed individuals were  
22 selling corporations that were, quote/unquote, aged,  
23 and an aged corporation could be sold for 5,000,  
24 \$10,000. And I believe there was an interest in  
25 just filing them and not using them, and just

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FN 11

|    |                                        |
|----|----------------------------------------|
| ■  | [REDACTED]                             |
| ■  | [REDACTED]                             |
| ■  | [REDACTED]                             |
| ■  | ■ [REDACTED]                           |
| ■  | ■ [REDACTED]                           |
| ■  | [REDACTED]                             |
| ■  | ■ [REDACTED]                           |
| ■  | [REDACTED]                             |
| ■  | ■ [REDACTED]                           |
| ■  | [REDACTED]                             |
| ■  | [REDACTED]                             |
| ■  | [REDACTED]                             |
| ■  | ■ [REDACTED]                           |
| ■  | [REDACTED]                             |
| ■  | ■ [REDACTED]                           |
| ■  | [REDACTED]                             |
| ■  | ■ [REDACTED]                           |
| 17 | Q. Are you aware of an entity called   |
| 18 | Administrative Account Services LLC?   |
| 19 | A. I do recall that name.              |
| 20 | Q. Okay. And did you have an ownership |
| 21 | interest in that entity?               |
| 22 | A. I believe I did.                    |
| ■  | ■ [REDACTED]                           |
| ■  | [REDACTED]                             |
| ■  | [REDACTED]                             |

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Lucas Erb

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1 Q. Administrative Accounts Services, LLC?

2           A. I believe, to the best of my knowledge, I'm  
3           the sole owner of Administrative Accounts Services.

[illegible]

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■ ■ [REDACTED]  
■ ■ [REDACTED] [REDACTED]  
■ ■ [REDACTED]  
■ ■ [REDACTED]  
■ ■ [REDACTED]  
■ ■ [REDACTED]  
■ [REDACTED]  
■ ■ [REDACTED]  
■ ■ [REDACTED]  
■ [REDACTED]  
■ ■ [REDACTED]

11 Q. And what is Amerivise LLC?

12 A. I believe approximately six or seven or  
13 eight years ago, it was a retail precious metals  
14 company.

15 Q. And were you a managing director of  
16 Amerivise LLC?

17 A. I don't recall my specific title due to how  
18 long ago it was.

19 MR. CRAWFORD: Okay. I'd like the court  
20 reporter to bring up Exhibit D as in "door."

21 (Receiver Exhibit 3 was marked for  
22 identification by the court reporter and is attached  
23 hereto.)

24 Show you a document from Delaware  
25 Depository Service Company for Amerivise LLC

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1 providing identification and then the name Luke Erb.

2 It says managing director.

3 Is that your signature?

4 A. I believe it was at that time.

5 Q. Okay. And were you the managing director  
6 of Amerivise LLC?

7 A. It appears at that time I was, but I don't  
8 recall.

9 Q. Okay. And then it lists Simon Batashvili  
10 as an account representative.

11 Do you recall Simon being an account  
12 representative for Amerivise LLC?

[REDACTED]

Q. Okay. Amerivise, LLC?

A. As disclosed in my first deposition, I think I owned half of that or some percentage of that, but I certainly was an owner in some capacity.

FN 13

Lucas Erb

January 29, 2021

Page 407

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

14 Q. Okay. Chasing Gold?

15 A. I'm familiar with the entity. I could have

16 had an ownership interest in it at one time.

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]



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FN 14

Q. Okay. Faulkner Management Corp.?

A. That must have been like over a half a decade ago. That's the name of my rock band. So probably set that up to do something with music or copyrights.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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FN 15

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

5 Q. Are you familiar with an entity called  
6 Federal Services LLC?

7 A. Yes, I am.

8 Q. And what does it do?

9 A. Please repeat the question.

10 Q. What does it do?

11 A. My best recollection is that entity is at  
12 least seven, maybe longer, years old, and I haven't  
13 been involved with it in at least over half a  
14 decade. So I don't recall.

15 Q. What did it used to do?

16 A. I believe it provided consulting services.

17 Q. Are you aware of any assets that it might  
18 still have?

19 A. I'm not aware of assets that it might still  
20 have.

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

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FN 17

[illegible]

24 Q. Have you ever heard of an entity called  
25 Instrabution LLC?

Lucas Asher Vol. I  
FN 17

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Page 179

1 A. I have heard of that entity.

2 Q. And what is that entity?

3 A. That was a software company.

4 Q. Is that now known as Revo?

5 A. I don't -- I can't say with certainty. I  
6 don't know.

7 Q. What does Instrabution LLC do today?

8 A. I don't know that it does something today.

9 Q. What did it ever do?

10 A. Software.

11 MR. CRAWFORD: Let's bring up Exhibit F as  
12 in "Frank."

13 (Receiver Exhibit 5 was marked for  
14 identification by the court reporter and is attached  
15 hereto.)

16 BY MR. CRAWFORD:

17 Q. The founder's agreement {for  
18 instribution.com.}

19 Have you seen this document before?

20 A. I have.

21 Q. And if you scroll down a little bit, do you  
22 recognize your signature at the bottom of this page?

23 A. It seems to be whited out, but I would  
24 assume I signed that.

25 Q. And what type of software did

Lucas Asher Vol. I

11/5/2020

**FN 17**

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1 instribution.com do?

2           A. It was a mobile-based social network.

3 Q. Did it ever have any bank accounts?

4           A. I believe it did.

5 Q. At what bank?

6           A. I don't believe I was ever on the bank  
7    account.

8 Q. And does it have any assets currently, to  
9 your knowledge?

10           A. I believe some of the software developed  
11       might be defined as an asset, so I would say yes.

[illegible]

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Page 185

[REDACTED]

14 Q. Have you ever heard of Resource Financial

15 Services, Inc.?

16 A. Yes.

17 Q. What does that entity do?

18 A. In continuing the theme I was transparent

19 about earlier, I believe we just acquired a set of

20 corporations for the purpose of aging them or

21 sitting on them, and to my understanding, I don't

22 believe these corporations were used. Specifically

23 that one, I think it just was set up and it just sat

24 there.

25 Q. And are you aware of any assets that it had

1 IN THE UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF TEXAS

3

4

COMMODITY FUTURES TRADING  
COMMISSION et al.,

6

Plaintiff,

7

vs.

8

TMTE, INC. A/k/a METALS.COM,  
CHASE METALS, INC., CHASE

9

METALS, LLC, BARRICK  
CAPITAL, INC., LUCAS THOMAS

10

ERB a/k/a LUCAS ASHER a/k/a  
LUKE ASHER, and SIMON

11

BATASHVILI

12

Defendants.

13

and

14

Tower Equity, LLC,

15

Relief Defendant

16

17

18 REMOTE VIDEO-RECORDED DEPOSITION OF SIMON BATASHVILI

19

Wednesday, November 4, 2020

20

VOLUME I

21

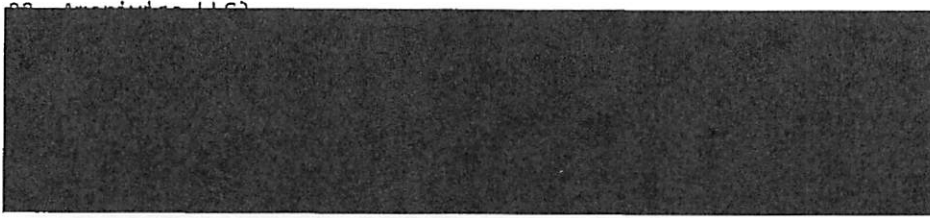
22 Stenographically Reported by:

Mechelle S. Gonzalez

23

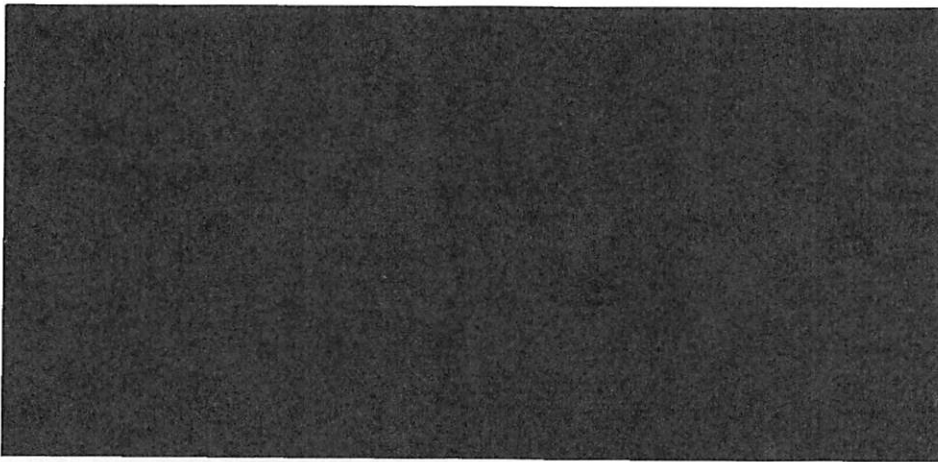
CSR No. 13250

Batashvili Deposition Transcript Pg. 135 Lines 9-25  
FN 12



135

⬆



9 All right. This will be, I guess, Exhibit  
10 Number 6.

11 (Exhibit 6 was marked for identification by  
12 the court reporter and is attached hereto.)

13 BY MR. CRAWFORD:

14 Q. It's a document entitled "Founders  
15 Agreement for Instabrution.com."

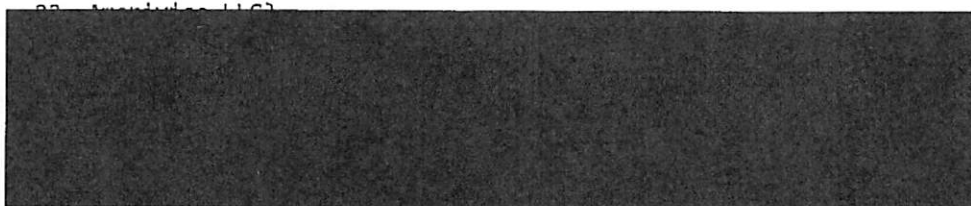
16 Are you familiar with this entity?

17 A. Yes, sir.

18 Q. Is that your signature next to your name?

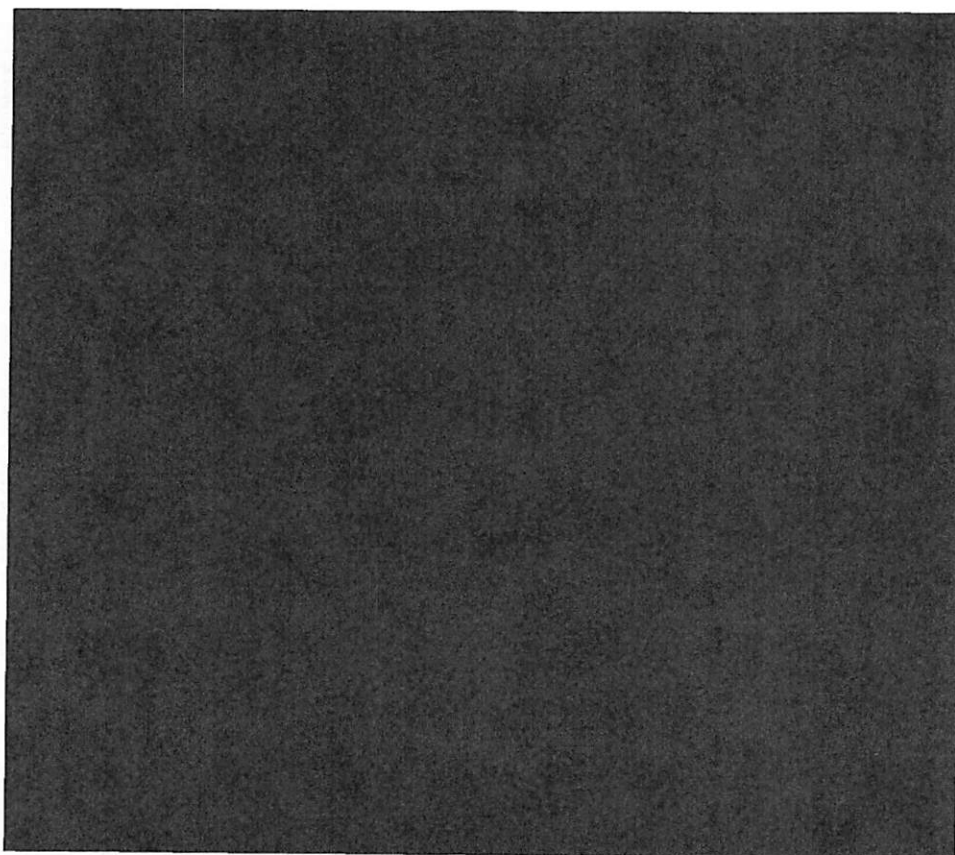


Batashvili Deposition Transcript Pg. 135 Lines 16-25  
FN 16



135

⬆



- 16 Are you familiar with this entity?
- 17 A. Yes, sir.
- 18 Q. Is that your signature next to your name?

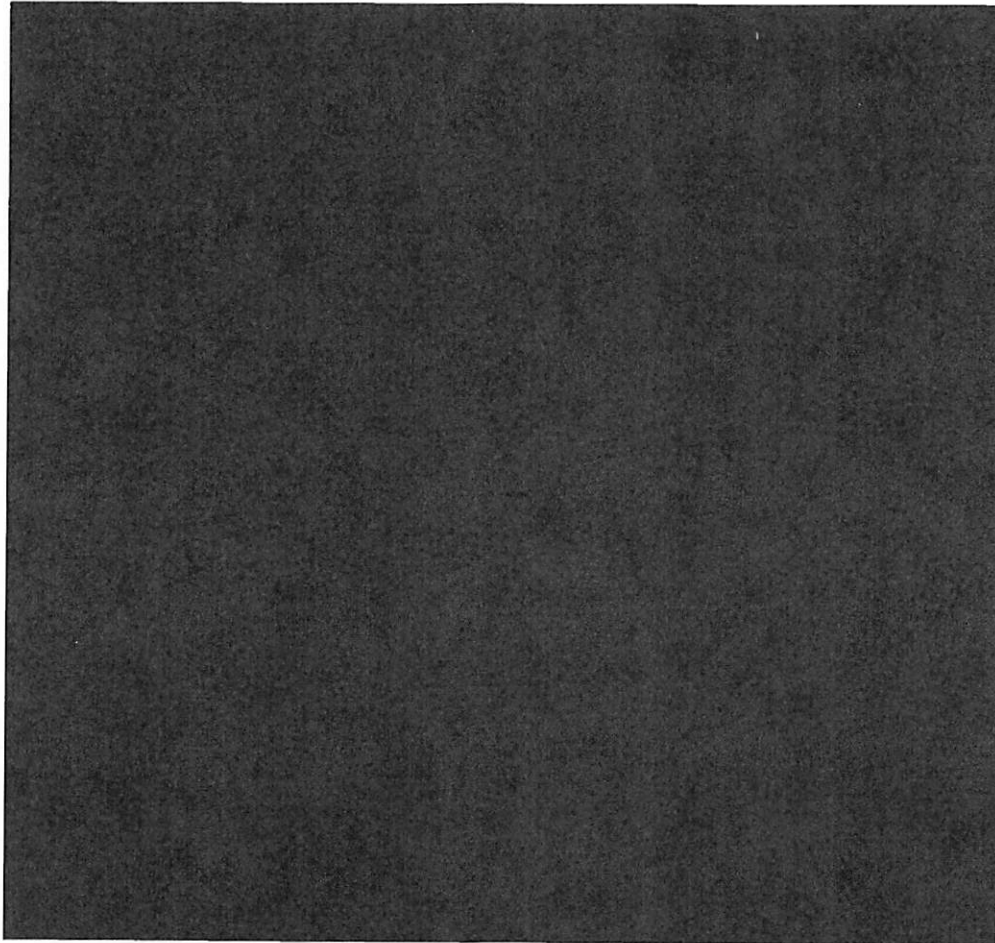
19 A. Kind of looks like it, yeah. I know the  
20 document. But, yes, sir.

21 Q. And what did Instabrution.com do?

22 A. Instabrution.com is essentially Revo LLC,  
23 sir. It's a media streaming application, is kind of  
24 where it started, I guess.

25 Q. And it started in 2000- -- 2013? March of

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Simon Batashvili

11/4/2020  
Page 36 (138 - 141)

| Page 138      | Page 140      |
|---------------|---------------|
| 1 [REDACTED]  | 1 [REDACTED]  |
| 2 [REDACTED]  | 2 [REDACTED]  |
| 3 [REDACTED]  | 3 [REDACTED]  |
| 4 [REDACTED]  | 4 [REDACTED]  |
| 5 [REDACTED]  | 5 [REDACTED]  |
| 6 [REDACTED]  | 6 [REDACTED]  |
| 7 [REDACTED]  | 7 [REDACTED]  |
| 8 [REDACTED]  | 8 [REDACTED]  |
| 9 [REDACTED]  | 9 [REDACTED]  |
| 10 [REDACTED] | 10 [REDACTED] |
| 11 [REDACTED] | 11 [REDACTED] |
| 12 [REDACTED] | 12 [REDACTED] |
| 13 [REDACTED] | 13 [REDACTED] |
| 14 [REDACTED] | 14 [REDACTED] |
| 15 [REDACTED] | 15 [REDACTED] |
| 16 [REDACTED] | 16 [REDACTED] |
| 17 [REDACTED] | 17 [REDACTED] |
| 18 [REDACTED] | 18 [REDACTED] |
| 19 [REDACTED] | 19 [REDACTED] |
| 20 [REDACTED] | 20 [REDACTED] |
| 21 [REDACTED] | 21 [REDACTED] |
| 22 [REDACTED] | 22 [REDACTED] |
| 23 [REDACTED] | 23 [REDACTED] |
| 24 [REDACTED] | 24 [REDACTED] |
| 25 [REDACTED] | 25 [REDACTED] |

| Page 139                                           | Page 141      |
|----------------------------------------------------|---------------|
| 1 [REDACTED]                                       | 1 [REDACTED]  |
| 2 [REDACTED]                                       | 2 [REDACTED]  |
| 3 [REDACTED]                                       | 3 [REDACTED]  |
| 4 [REDACTED]                                       | 4 [REDACTED]  |
| 5 [REDACTED]                                       | 5 [REDACTED]  |
| 6 [REDACTED]                                       | 6 [REDACTED]  |
| 7 [REDACTED]                                       | 7 [REDACTED]  |
| 8 [REDACTED]                                       | 8 [REDACTED]  |
| 9 [REDACTED]                                       | 9 [REDACTED]  |
| 10 [REDACTED]                                      | 10 [REDACTED] |
| 11 [REDACTED]                                      | 11 [REDACTED] |
| 12 [REDACTED]                                      | 12 [REDACTED] |
| 13 [REDACTED]                                      | 13 [REDACTED] |
| 14 [REDACTED]                                      | 14 [REDACTED] |
| 15 [REDACTED]                                      | 15 [REDACTED] |
| 16 [REDACTED]                                      | 16 [REDACTED] |
| 17 Q. Ever heard of an entity called               | 17 [REDACTED] |
| 18 First American Savings, Inc.?                   | 18 [REDACTED] |
| 19 A. Yes.                                         | 19 [REDACTED] |
| 20 Q. And what is that?                            | 20 [REDACTED] |
| 21 A. That was a real estate finance company that  | 21 [REDACTED] |
| 22 I started, that I founded maybe 15 years ago or | 22 [REDACTED] |
| 23 14 years ago. I can't remember.                 | 23 [REDACTED] |
| 24 Q. Is it still operating, or was it operating   | 24 [REDACTED] |
| 25 in September of 2020?                           | 25 [REDACTED] |



Batashvili Deposition Transcript Pg. 93 Lines 20-25  
FN 17

20 Okay.

21 So I'll mark this as Exhibit 3 and show

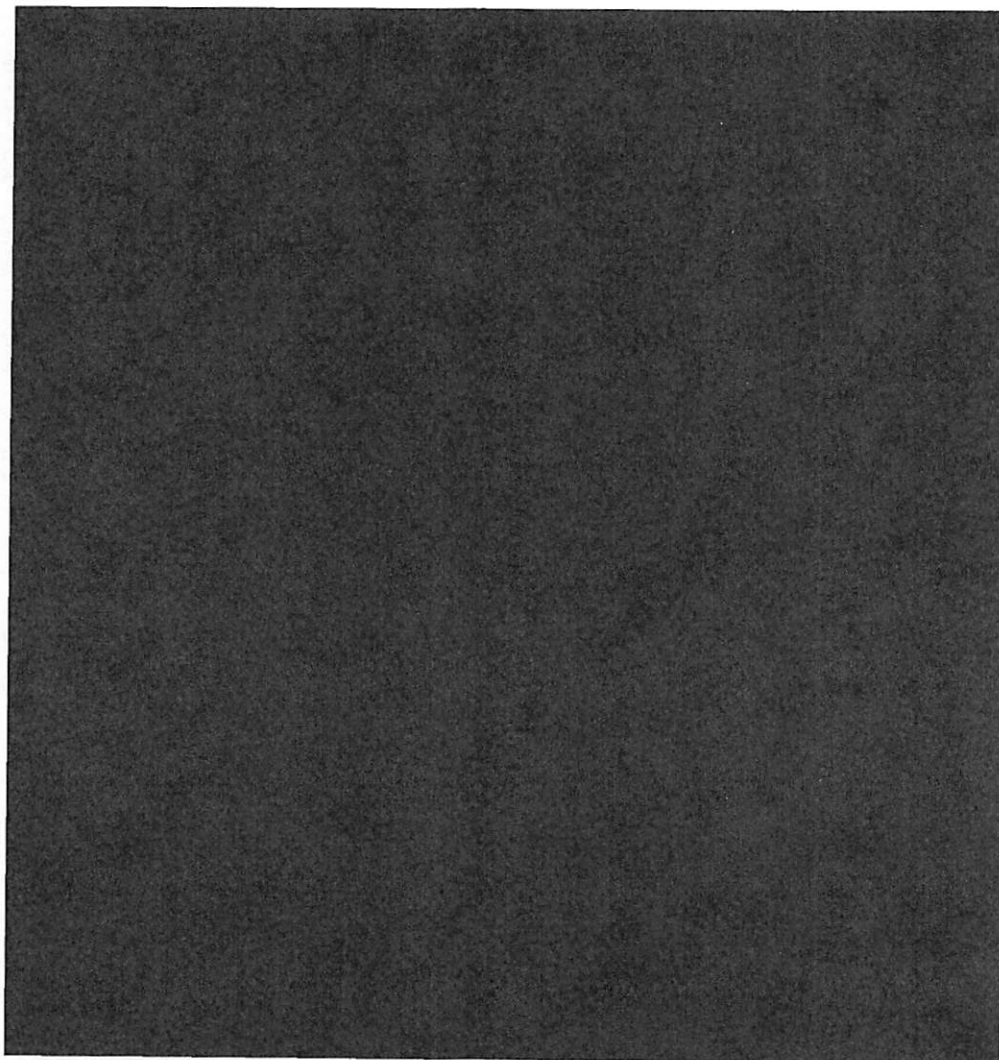
22 you.

23 BY MR. CRAWFORD:

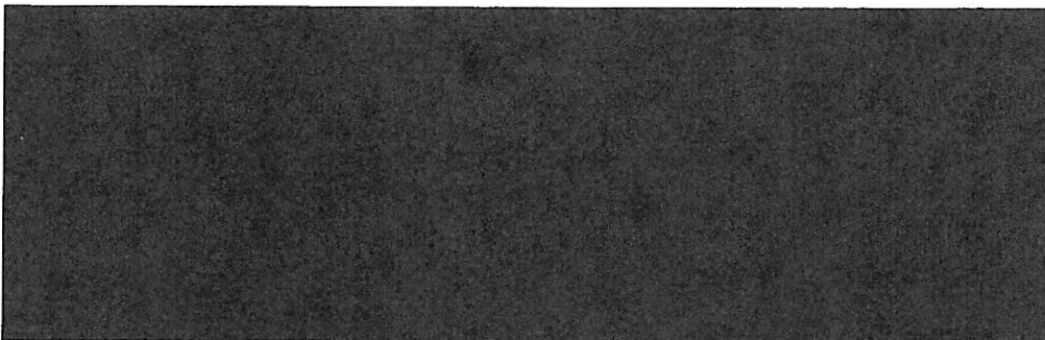
24 Q. This is a certificate for Revo LLC.

25 Have you seen this document before?

94



Batashvili Deposition Transcript Pg. 94 Lines 1-2  
FN 17

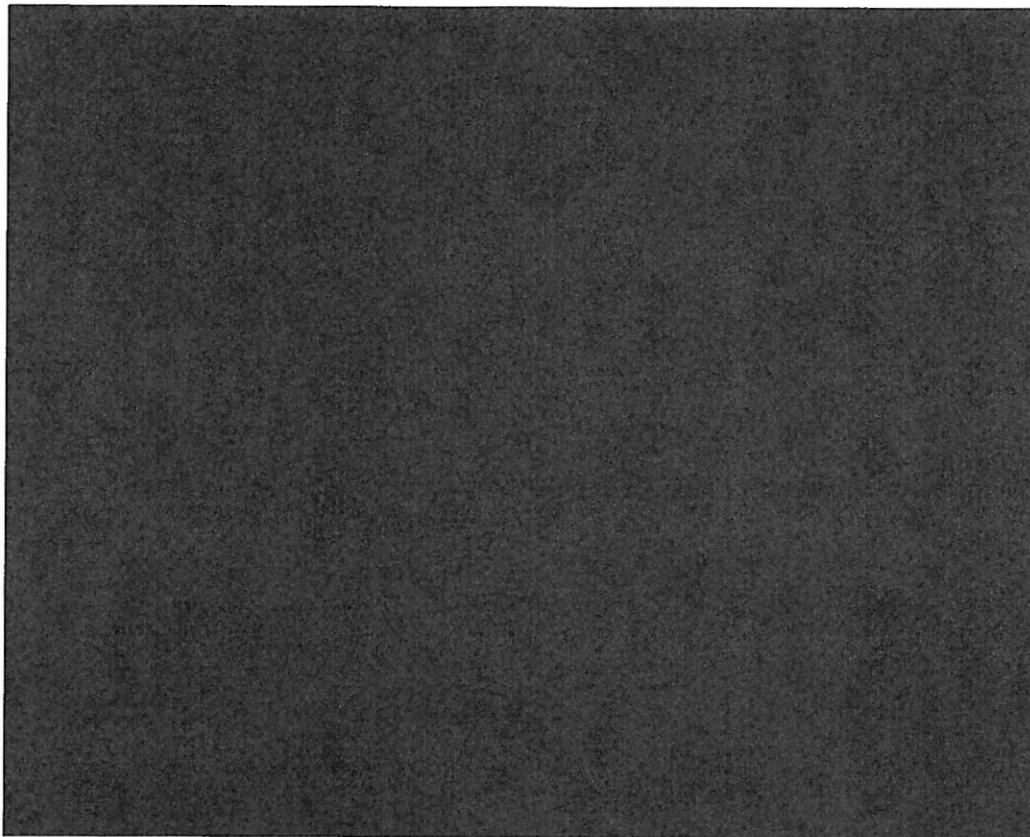


94

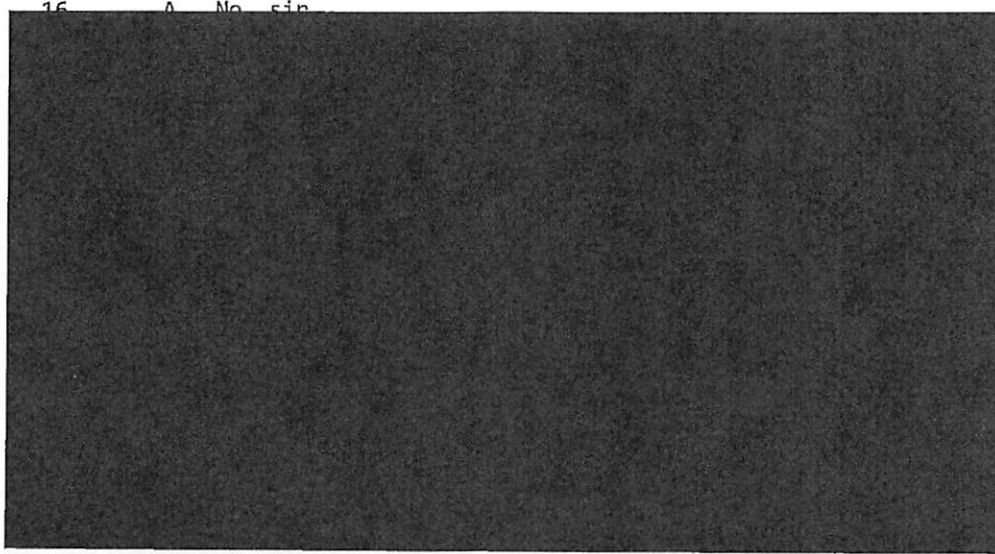
⤴

1 A. Yes, I've seen it before.

2 Q. Okay. And what is this?



Batashvili Deposition Transcript Pg. 137 Lines 1-5  
FN 17



137

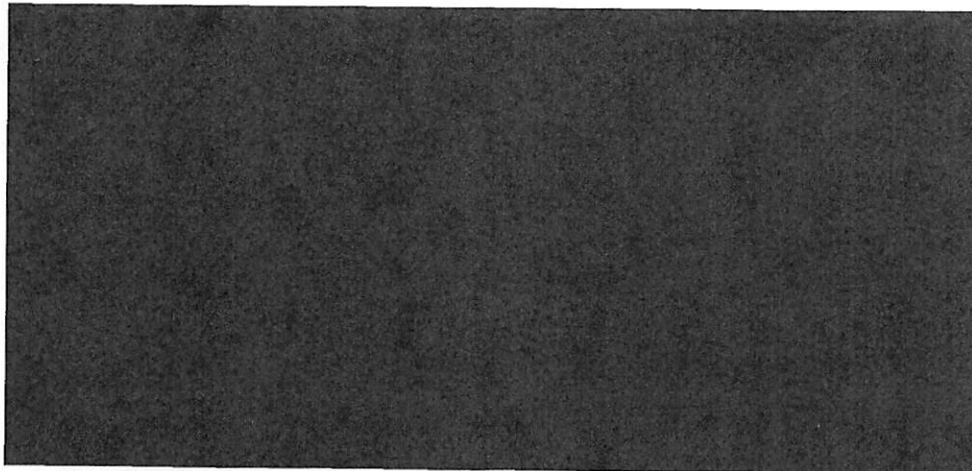
1 in Administrative Account Services LLC?

2 A. No, sir. Not that I'm aware of, no.

3 Q. Is this money transferred to fund payroll

4 for employees?

5 A. I'm not sure.



**CONSENT TO ACTION WITHOUT A MEETING OF THE**  
**BOARD OF DIRECTORS**  
**OF**  
**RESOURCE FINANCIAL SERVICES, INC.**  
**A CORPORATION**

In accordance with the Provisions of the Wyoming Business Corporation Act, Mark Pierce, sole Shareholder and Director of Resource Financial Services, Inc., a Corporation, hereby consents to the following action:

RESOLVED that Lucas Asher is hereby appointed as sole Director of Resource Financial Services, Inc., a Corporation to serve until a successor is duly elected and qualified.

FURTHER RESOLVED that the Director, Lucas Asher, shall have full power and authority to act on behalf of Resource Financial Services, Inc..

RESOLVED FURTHER, that, Lucas Asher, is hereby authorized to manage, control, and operate any portion of the business with such being but not limited to: any and all lawful business transactions; the opening a bank account in the name of this entity for the deposit of funds belonging to the company, such funds to be withdrawn by authorized parties.

FURTHER RESOLVED that, Mark Pierce, resigning Director of Resource Financial Services, Inc., a Corporation, hereby tender and submit my resignation as a Director of any and all positions with the above named Corporation, such resignation to be effective this 8/31/2020.

IN WITNESS WHEREOF, the undersigned has executed this Written Consent as of the

date hereof.

  
\_\_\_\_\_  
Mark Pierce, Director





**CONSENT TO ACTION WITHOUT A MEETING OF THE MEMBERS**

**OF**

**EGON PEARSON, LLC**

In accordance with the Provisions of the Wyoming Limited Liability Company Act, Graham H. Norris, Jr., the Manager of EGON PEARSON, LLC (the "Company"), hereby consents to the following action:

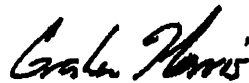
RESOLVED, that LUCAS ASHER is hereby appointed as the Manager of the Company, to serve until successors are duly elected and qualified.

RESOLVED, that Graham H. Norris, Jr. hereby resigns as Manager of the Company, effective as of the date of this action.

RESOLVED, that Graham H. Norris, Jr. shall hereby be re-appointed as a special Manager of the Company, every 59 calendar days for the next twelve (12) months, such appointment to last for no longer than 48 hours, with no authority or responsibilities as Manager except to serve as Manager for the purpose of acting as the contact person and Manager of record to the Company's registered agent in Wyoming, pursuant to the requirements of the Wyoming Registered Agent Act.

IN WITNESS WHEREOF, the undersigned has executed this Written Consent as of the date hereof.

DATED this Wednesday, December 05, 2018.



Graham H. Norris, Jr.  
Manager





**CONSENT TO ACTION WITHOUT A MEETING OF THE MEMBERS**  
**OF**  
**RETIREMENT INSIDER, LLC**

In accordance with the Provisions of the Wyoming Limited Liability Company Act, Graham H. Norris, Jr., the Manager of RETIREMENT INSIDER, LLC (the "Company"), hereby consents to the following action:

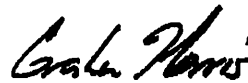
RESOLVED, that LUCAS ASHER is hereby appointed as the Manager of the Company, to serve until successors are duly elected and qualified.

RESOLVED, that Graham H. Norris, Jr. hereby resigns as Manager of the Company, effective as of the date of this action.

RESOLVED, that Graham H. Norris, Jr. shall hereby be re-appointed as a special Manager of the Company, every 59 calendar days for the next twelve (12) months, such appointment to last for no longer than 48 hours, with no authority or responsibilities as Manager except to serve as Manager for the purpose of acting as the contact person and Manager of record to the Company's registered agent in Wyoming, pursuant to the requirements of the Wyoming Registered Agent Act.

IN WITNESS WHEREOF, the undersigned has executed this Written Consent as of the date hereof.

DATED this Monday, October 15, 2018.



Graham H. Norris, Jr.  
Manager



**CONSENT TO ACTION WITHOUT A MEETING OF THE DIRECTORS**  
**OF**  
**BEST NEW, INC.**

In accordance with the Provisions of the Wyoming Business Corporation Act, Graham H. Norris, Jr., the Director of BEST NEW, INC. (the "Company"), hereby consents to the following action:

RESOLVED, that LUCAS ASHER is hereby appointed as the Director of the Company, to serve until successors are duly elected and qualified.


RESOLVED, that Graham H. Norris, Jr. hereby resigns as Director of the Company, effective as of the date of this action.

RESOLVED, that Graham H. Norris, Jr. hereby resigns as all of the Nominee Officers of the Company, effective as of the date of this action.

RESOLVED, that Graham H. Norris, Jr. shall hereby be re-appointed as a special Director of the Company, every 59 calendar days for the next twelve (12) months, such appointment to last for no longer than 48 hours, with no authority or responsibilities as Director except to serve as Director for the purpose of acting as the contact person and Director of record to the Company's registered agent in Wyoming, pursuant to the requirements of the Wyoming Registered Agent Act.

IN WITNESS WHEREOF, the undersigned has executed this Written Consent as of the date hereof.

DATED this Tuesday, December 04, 2018.



Graham H. Norris, Jr.  
Director



**CONSENT TO ACTION WITHOUT A MEETING OF THE DIRECTORS**  
**OF**  
**TOWER ESTATES, INC.**

In accordance with the Provisions of the Wyoming Business Corporation Act, Graham H. Norris, Jr., the Director of TOWER ESTATES, INC. (the "Company"), hereby consents to the following action:

RESOLVED, that SIMON BATASHVILI is hereby appointed as the Director of the Company, to serve until successors are duly elected and qualified.

RESOLVED, that Graham H. Norris, Jr. hereby resigns as Director of the Company, effective as of the date of this action.

RESOLVED, that Graham H. Norris, Jr. hereby resigns as all of the Nominee Officers of the Company, effective as of the date of this action.

RESOLVED, that Graham H. Norris, Jr. shall hereby be re-appointed as a special Director of the Company, every 59 calendar days for the next twelve (12) months, such appointment to last for no longer than 48 hours, with no authority or responsibilities as Director except to serve as Director for the purpose of acting as the contact person and Director of record to the Company's registered agent in Wyoming, pursuant to the requirements of the Wyoming Registered Agent Act.

IN WITNESS WHEREOF, the undersigned has executed this Written Consent as of the date hereof.

DATED this Tuesday, September 12, 2017.



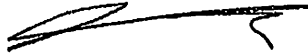
Graham H. Norris, Jr.  
Director



**STATE of DELAWARE**  
**CERTIFICATE of INCORPORATION**  
**USA Accounts, Inc.**

- First: The name of the corporation is USA Accounts, Inc.
- Second: Its registered office in the state of Delaware is located at 112 Capitol Trail Suite A, Newark, New Castle, DE, 19711. The registered agent thereof is SOCIAL ENTERPRISES LLC.
- Third: The purpose of the corporation is to engage in any lawful act or activity for which corporations may be organized under the General Corporation Law of Delaware,
- Fourth: The total authorized capital stock of this corporation shall consist of one thousand (1000) shares of common stock, all of which shares will be with no par value.
- Fifth: This corporation reserves the right to amend, alter, change or repeal any provision contained in this certificate of Incorporation, in the manner now or hereafter prescribed by statute, and all rights or powers conferred upon stockholders and directors herein are granted subject to this reservation.
- Sixth: Lucas Asher is the Incorporator at 8383 Wilshire Blvd, 742 Beverly Hills, CA 90211 United States.

I, THE UNDERSIGNED incorporator named herein, for the purpose of forming a corporation to do business within and without the State of Delaware, and in pursuance of and under the laws of the State of Delaware, do make and file this Certificate of Incorporation, hereby declaring and certifying that the facts herein stated are true, and accordingly, I have herein to set my hand and seal this 17<sup>th</sup> Day of August, 2020.



\_\_\_\_\_  
Lucas Asher  
(Incorporator of USA Accounts, Inc.)

State of Delaware  
Secretary of State  
Division of Corporations  
Delivered 07:59 AM 08/17/2020  
FILED 07:59 AM 08/17/2020  
SR 20206769404 - File Number 3455097

